



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

October 29, 2021


BY ECF

The Honorable Vernon S. Broderick
United States District Court Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Luis Lluberes et al.*, 20 Cr. 493 (VSB)

Dear Judge Broderick:

The Government respectfully writes to request an exclusion of time from Speedy Trial Act calculations. On October 28, 2021, the Court granted the defendants' second request to adjourn the pretrial motions deadline, until December 1, 2021. (*See* Dkt. Nos. 97, 103-106, 109.) For the reasons set forth in the defendants' various letters concerning their need for additional time to consider and prepare pretrial motions, the Government requests that time be prospectively excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), until a control date set by the Court. Yesterday, the Government inquired with defense counsel as to their position on an exclusion of time. Counsel for Maria Aguilar, a/k/a "Maria Hewitt" and Maria Lopez consent to the request. Counsel for Luis Lluberes and Moises Lluberes have not yet responded.

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 11/2/2021

The Government's request that I exclude time in the interests of justice under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) is granted through December 1, 2021. Such a continuance is necessary to allow defense counsel to prepare and file pretrial motions. I find that the ends of justice served by granting the continuance outweigh the interest of the public and Defendants in a speedy trial.

Respectfully submitted,

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By: /s/
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cc: all counsel of record (by ECF)